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November 13, 2018

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

Re: Application of NGA 911, L.L.C. for a Certificate of Public Convenience
and Necessity to Provide Resold and Facilities-Based Local Exchange
and Interexchange (Including Exchange Access) Telecommunications
Services in the State of South Carolina, and for Alternative and Flexible
Regulation
Docket No. 2018-331-C

Dear Ms. Boyd:

Please find enclosed for filing on behalf of the South Carolina Telephone
Coalition (the "Coalition"), a Petition to Intervene in the above-referenced
docket. By copy of this letter and Certificate of Service all parties of record will
receive a copy of this Petition to Intervene via the U. S. Postal Service.

Thank you for your assistance.

Sincerely,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

MMF:khh

Enclosure: as stated

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BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

Docket No. 2018-331-C

Re: Application of NGA 911, L.L.C. for a
Certificate of Public Convenience and
Necessity to Provide Resold and Facilities-
Based Local Exchange and Interexchange
(Including Exchange Access)
Telecommunications Services in the State
of South Carolina, and for Alternative and
Flexible Regulation

PETITION TO INTERVENE

In response to the Commission's Notice of Filing of the Application of NGA 911, L.L.C. ("NGA") for a Certificate of Public Convenience and Necessity to provide local exchange and interexchange (including exchange access) telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."

2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.

3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would

potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
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By: 

Attorneys for Intervenor South Carolina
Telephone Coalition

November 13, 2018

Columbia, South Carolina

EXHIBIT A

South Carolina Telephone Coalition Member Companies
for Purposes of Local Service Stipulation

Chesnee Telephone Company
Chester Telephone Company, d/b/a TruVista
Comporium, Inc. (f/k/a Rock Hill Telephone Company)
Farmers Telephone Cooperative, Inc.
Ft. Mill Telephone Company, d/b/a Comporium
Home Telephone ILEC, LLC d/b/a Home Telecom
Lancaster Telephone Company, d/b/a Comporium
Lockhart Telephone Company, d/b/a TruVista
McClellanville Telephone Company (TDS)
Norway Telephone Company (TDS)
Palmetto Rural Telephone Cooperative, Inc.
Piedmont Rural Telephone Cooperative, Inc.
PBT Telecom, d/b/a Comporium
Ridgeway Telephone Company, d/b/a TruVista
St. Stephen Telephone Company (TDS)
West Carolina Rural Telephone Cooperative, Inc.
Williston Telephone Company (TDS)


BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
Docket No. 2018-331-C

Re: Application of NGA 911, L.L.C. for a)	
Certificate of Public Convenience and)	
Necessity to Provide Resold and Facilities-)	
Based Local Exchange and Interexchange)	CERTIFICATE OF SERVICE
(Including Exchange Access))	
Telecommunications Services in the State of)	
South Carolina, and for Alternative and)	
Flexible Regulation)	

I, Kathy Handrock, Paralegal for McNair Law Firm, P.A., do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited in the United States Mail, First Class, postage prepaid to:

John J. Pringle, Jr.
Adams and Reese, LLP
1501 Main St., 5th Floor
Columbia SC 29201

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
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